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5 Attorneys for Respondent  
United States of America  
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8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
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11 UNITED STATES OF AMERICA,  
12 Plaintiff/Respondent,  
13 v.  
14 BAO LU, SON VAN NGUYEN, THY  
CHANN, and HOANG AI LE,  
15 Defendants/Movants.  
16

2:99-CR-00433-WBS-AC

CONSOLIDATED STIPULATION AND  
17 ~~PROPOSED~~ ORDER FOR EXTENSION OF TIME  
IN WHICH TO FILE OBJECTIONS TO  
MAGISTRATE JUDGE'S FINDINGS AND  
RECOMMENDATIONS.

(ECF. 1807 – 1810)

18 Respondent United States of America, by and through its attorneys of record, McGregor W.  
19 Scott, United States Attorney, and Jason Hitt, Assistant United States Attorney, hereby requests a 30-day  
20 extension of time until September 23, 2019, in which to file its consolidated objections to Magistrate  
21 Judge's findings and recommendations. Docket Nos. 1807-1810.

22 In light of the recent decisions in *United States v. Davis*, 677 Fed. Appx. 933 and *United States*  
23 *v. Begay*, \_\_\_ F.3d \_\_\_, 2019 WL 3884261; counsel for the Government is awaiting additional guidance  
24 from the Department.

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STIPULATION FOR EXTENSION OF TIME TO FILE  
OBJECTIONS TO THE MAGISTRATE JUDGE'S FINDINGS  
AND RECOMMENDATIONS

1 Geoffrey M. Jones, counsel for Hoang Ai Le, does not oppose the Government's request.

2 Katherine Hart, counsel for Bao Lu, does not oppose the Government's request.

3 Lindsay Weston, counsel for Thy Chann, does not oppose the Government's request.

4 Benjamin Ramos, counsel for Son Van Nguyen, does not oppose the Government's request.

5 Dated: August 23, 2019

6 McGREGOR W. SCOTT  
United States Attorney

7 /s/ JASON HITT

8 JASON HITT  
9 Assistant United States Attorney

10 Dated: August 23, 2019

/s/ GEOFFREY JONES

11 GEOFFREY JONES  
12 Attorney for Hoang Ai Le

13 Dated: August 23, 2019

/s/ KATHERINE HART

14 KATHERINE HART  
Attorney for Bao Lu

15 Dated: August 23, 2019

/s/ LINDSAY WESTON

16 LINDSAY WESTON  
Attorney for Thy Chann

17 Dated: August 23, 2019

/s/ BENJAMIN RAMOS


18 BENJAMIN RAMOS  
19 Attorney for Son Van Nguyen

1 **~~[PROPOSED]~~ ORDER**

2 The Court, having received, read, and considered the stipulation of the parties, and good cause  
3 appearing therefrom, adopts the stipulation of the parties in its entirety as its order.

4 It is further ordered that the Government's Consolidated Objections to the Magistrate Judge's  
5 Findings and Recommendations is now due September 23, 2019.

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7 DATED: August 23, 2019

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9 ALLISON CLAIRE  
10 UNITED STATES MAGISTRATE JUDGE  
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